



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

January 31, 2021

BY ECF

The Honorable Andrew L. Carter, Jr.
United States District Court Judge
Southern District of New York
40 Foley Square
New York, New York 10007


Re: *United States v. Ronald Romano*, 20 Cr. 585 (ALC)

Dear Judge Carter:

The Government respectfully writes, with the consent of the above-referenced defendant's counsel, to request an adjournment of the status conference, currently scheduled for February 2, 2021 at 10:00 a.m. The Government is in the process of completing its production of discovery in this matter. Specifically, a large volume of email and electronic correspondence, which is being processed by an outside vendor, still needs to be produced to the defense. Accordingly, the parties request a forty-five day adjournment of the status conference. The Government further requests, with the consent of the defendant's attorney, Mark Macron, Esq., that time be prospectively excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), until the date of the next conference. The exclusion of time will enable the Government to complete the production of discovery and the defense to consider possible motion practice.

Respectfully submitted,

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cc: Mark Macron, Esq.